

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
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Amendment of Section 25.131)
of the Commission's Rules)
and Regulations to Eliminate the)
Licensing Requirement for Certain)
International Receive-Only)
Earth Stations)
)

CC Docket No. 93-23
RM-7931

COMMENTS OF TRANSWORLD INTERNATIONAL, INC.

Transworld International, Inc. ("Transworld") submits these comments in support of the Commission's proposal in its Notice of Proposed Rulemaking ("NPRM") to eliminate the licensing requirement for most international receive-only earth stations.

Transworld is the FCC licensee of an international receive-only earth station which operates with the Russian Western Space Data Relay Network ("WSDRN") communications satellite.

A. Generally, Deregulation of International
Receive-Only Stations Is Desirable

Transworld endorses the Commission's proposals to eliminate the licensing requirement: (a) for those receive-only earth stations operating with Intelsat satellites which are not subject to Section 201(c)(7) of the Communications Satellite Act of 1962 ("Satellite Act"); and (b) for all receive-only earth stations

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operating with non-Intelsat international satellites for which the U.S. has completed the consultation process with Intelsat.

As noted in the NPRM, "the Commission's experience with deregulation of domestic receive-only earth stations has been positive" (NPRM, ¶ 6). Unnecessary regulation is burdensome and costly to the public, the telecommunications industry and the Commission. Deregulation has procompetitive benefits by enabling carriers to respond promptly to customer requirements, unencumbered by the costly licensing process and the unavoidable regulatory delays.

B. Specifically, Deregulation of International Receive-Only Stations Operating With WSDRN Satellite Is In Public Interest

WSDRN receive-only earth stations are licensed under the Communications Act of 1934, as amended ("Act"); and the Satellite Act is not involved. Therefore, the FCC has authority to eliminate the licensing requirement for all WSDRN receive-only stations because "licensing of receive-only earth stations is not mandated by the Act." Regulation of Receive-Only Domestic Earth Stations, 74 FCC 2d 205, 217 (1979). Moreover, the WSDRN satellite consultation with Intelsat has been completed. Accordingly, WSDRN receive-only stations meet the deregulatory standards of the NPRM.

Transworld contemplates expanded use of the WSDRN satellite by additional receive-only stations. Such expanded use, unencumbered by unnecessary, burdensome and costly licensing requirements, will advance important goals of U.S. foreign policy by fostering technological and scientific cooperation with Russia, helping it rebuild its economic infrastructure, and encouraging conversion of former Soviet military technology to commercial use. Therefore, the deregulation of WSDRN receive-only stations has additional public interest benefits.

The Commission is respectfully requested to adopt the NPRM's proposals promptly. In the meantime, the FCC should engage in a liberal licensing waiver policy for international receive-only earth stations which meet the criteria for deregulation as specified in the NPRM.

Respectfully submitted,

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